

NRC INSPECTION MANUAL

PART 9900: TECHNICAL GUIDANCE

ANSI56.TG

AMERICAN NATIONAL STANDARDS INSTITUTE
ANSI N45.2.9, SECTION 5.6
NRC CRITERIA FOR RECORDS STORAGE FACILITIES

A. PURPOSE

To provide the NRC criteria for records storage facilities.

B. DISCUSSION

A proposed revision to ANSI N45.2.9-1974 modifies the fire protection requirements for a 4-hour rated records storage facility based on the provisions of NFPA No. 232 to a 2-hour rated facility without reference to any other guidance contained in the NFPA documents. As a result, the NRC staff developed specific criteria which a 2-hour rated facility must meet to provide adequate protection for vital records. It was the NRC staff's position that the 2-hour fire rating requirements contained in proposed N45.2.9 could be met by any one of the following methods:

1. A 2-hour vault meeting NFPA No. 232 without additional provisions;
- ¹2. 2-hour rated file containers meeting NFPA No. 232 (Class B)

¹Lifetime and non-permanent records that could impact on safety can be secured in an acceptable manner from fire if, as a minimum they are stored in two-hour fire rated file cabinets meeting NFPA No. 232 (Class B) without the need for additional fire protection requirements on the building.

The rationale supporting this position is:

1. The loss of or damage to records does not generally pose an immediate threat to the public health and safety.
2. Lost or damaged records can to some degree be reconstructed by researching other files (i.e., engineering, principal contractors, or vendors), performing additional inspections or tests (including NDT), or removing a system or component for further evaluation.

without

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3. There are no requirements to protect records from fire prior to final storage. This includes records prior to and during shipment of an item and during receipt, installation and test of an item.

¹(FOOTNOTE CONTINUED)

We note that the two-hour rated file cabinets can be maintained at various locations at each facility which can minimize/eliminate the temporary storage of records for an extended period of time problem that was experienced at several facilities. However, the licensees administrative control program for records storage will have to address how and where required records are stored.

REFERENCE: This revision position was discussed in a memorandum, W. P. Haass to W. M. Morrison, Dated February 19, 1980.

NRR will use the above criteria in connection with their review of Licensees records storage applications.

additional NFPA provisions; or,

3. 2-hour rated fire resistant file room meeting NFPA No. 232 if the following additional provisions are provided:
 - a. Early warning fire detection and automatic fire suppression should be provided, with electronic supervision at a constantly attended central station.
 - b. Records should be stored in fully enclosed metal cabinets. Records should not be permitted on open steel shelving. No storage or records should be permitted on the floor of the facility. Adequate access and aisle ways should be maintained at all times throughout the facility.
 - c. Work not directly associated with records storage or retrieval should be prohibited within the records storage facility. Examples of such prohibited activities include but are limited to: records reproduction, film developing, and fabrication of microfiche cards.
 - d. Smoking and eating/drinking should be prohibited throughout the records storage facility.
 - e. Ventilation, temperature, and humidity control equipment should be protected inside with standard fire-door dampers where they penetrate fire barriers bounding the facility.

C. REFERENCE

This position was discussed in a memorandum, C. J. Heltemes, QAB, to W. M. Morrison, SD, dated April 19, 1978.

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